

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

<b>IN RE:</b>	: <b>CASE NO: 21-01051-JAW</b>
	: <b>CHAPTER: 13</b>
	:
<b>JESSICA RENEE JENKINS</b>	:
<b>Debtor</b>	:
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<b>SELECT PORTFOLIO SERVICING, INC.</b>	:
<b>AS SERVICER FOR TOWD POINT</b>	:
<b>MORTGAGE TRUST 2017-1, U.S. BANK</b>	:
<b>NATIONAL ASSOCIATION, AS</b>	:
<b>INDENTURE TRUSTEE,</b>	:
<b>Movant,</b>	:
	: <b>CONTESTED MATTER</b>
<b>vs.</b>	:
	:
<b>JESSICA RENEE JENKINS</b>	:
<b>HAROLD J. BARKLEY, JR., Trustee</b>	:
<b>Respondents.</b>	:

**OBJECTION TO CONFIRMATION**

COMES NOW, Select Portfolio Servicing, Inc. as servicer for Towd Point Mortgage Trust 2017-1, U.S. Bank National Association, as Indenture Trustee, its successors or assigns, (hereinafter referred to as “Movant”) and shows the Court that for reasons set out below, Movant objects to the confirmation of the Debtor’s Plan;

1.

Movant is a secured creditor of the Debtor’s regarding a property located at 204 Old Decatur Rd, Union, MS 39365 (the “Property”). Movant will file a Proof of Claim listing arrearages of approximately \$41,091.27 and a secured total amount of approximately \$103,758.68 on or before the claims bar deadline. The Debtor’s Plan lists Movant’s lien in Section 3.1(b) Non-Principal Residence Mortgage stating “See section 8.1 NonStandard

Provision”. In Section 8.1 Movant is listed as follows: “SPS Mortgage - house burned - Debtor to use fire insurance money to pay \$18,782.95 to SPS Mortgage for release of lien”.

2.

Though not included in plan section 3.2 *Motion for valuation of security, payment of fully secured claims, and modification of undersecured claims*, Debtor appears to be attempting to cramdown a nonprincipal place of residence to value by stating the \$18,782.95 insurance proceeds will pay off the loan. Movant disputes the value of the property is less than or equal to \$18,782.95. Movants payoff is approximately \$103,758.68 and most recent BPO lists value of the property at least \$59,000.00. For these reasons, Movant’s objects to the Debtor’s plan in its current form and requests permission for inspection and appraisal of subject property.

WHEREFORE, Select Portfolio Servicing, Inc. as servicer for Towd Point Mortgage Trust 2017-1, U.S. Bank National Association, as Indenture Trustee, its successors or assigns, prays that this Court inquire as to the matters raised herein and deny confirmation of the Debtor’s Plan, or enter such orders and require such further inquiry as may appear appropriate to the Court.

Dated: 8/3/21

/s/ Natalie Brown

Natalie Brown

MS State Bar No. 100802

Rubin Lublin, LLC

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Attorney for Creditor

**CERTIFICATE OF SERVICE**

I, Natalie Brown of Rubin Lublin, LLC certify that I caused a copy of the Objection to Confirmation to be filed in this proceeding by electronic means and to be served by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage thereon to the said parties as follows:

Jessica Renee Jenkins  
202 Old Decatur Rd  
Union, MS 39365

Frank H. Coxwell, Esq.  
Coxwell Attorneys  
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Harold J. Barkley, Jr., Trustee  
P.O. Box 4476  
Jackson, MS 39296-4476

United States Trustee  
501 E. Court Street  
Suite 6-430  
Jackson, MS 39201

Executed on: 8/3/21

By: /s/ Natalie Brown  
Natalie Brown  
MS State Bar No. 100802  
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